

Message

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**From:** d'Almeida, Carolyn K. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9EC4401AFA1846DD93D52A0DDA973581-CDALMEID]  
**Sent:** 6/21/2016 9:50:10 PM  
**To:** Wayne Miller [Miller.Wayne@azdeq.gov]  
**Subject:** RE: 2016-6-21 - wafb - AZ Attorney will call in - will forward invite to TLePage - BCT - June 22 - ST012 SEE EBR  
**Attachments:** Draft June 2016 Response Letter re ST012 SEE and EBR from AH and TLP to PM.docx

Forgot ... I made a few additions yesterday. This is the version we are looking at now.

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**From:** Wayne Miller [mailto:Miller.Wayne@azdeq.gov]  
**Sent:** Tuesday, June 21, 2016 2:39 PM  
**To:** d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>  
**Subject:** 2016-6-21 - wafb - AZ Attorney will call in - will forward invite to TLePage - BCT - June 22 - ST012 SEE EBR

Thanks - Are there any revisions to the June 15 Draft joint Agency letter (Angeles H and T LePage)? Or has that joint letter been tabled? Thank you.

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**From:** d'Almeida, Carolyn K. [mailto:dAlmeida.Carolyn@epa.gov]  
**Sent:** Tuesday, June 21, 2016 2:30 PM  
**To:** Wayne Miller <Miller.Wayne@azdeq.gov>  
**Subject:** 2016-6-21 - wafb - request for tina to attend BCT - June 22 - ST012 SEE EBR - cda epa

Note from Angeles:

FYI: I called Philip Mook to let him know that I will participate on the call. He appreciated the heads up and said "I was planning to, but now I must." He mentioned he was aware that we have some concerns. He also mentioned that they have received our comments from last Friday.

You might want to invite Tina as well. Will Tony be there? Time to "lawyer up"

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**From:** Wayne Miller [mailto:Miller.Wayne@azdeq.gov]  
**Sent:** Tuesday, June 21, 2016 2:22 PM  
**To:** d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>  
**Subject:** 2016-6-21 - wafb - thanks - Draft Joint Agency Response to June 7 AF letter - june 15 version AH TLP - ST012 SEE EBR - cda epa

Thank you.

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**From:** d'Almeida, Carolyn K. [mailto:dAlmeida.Carolyn@epa.gov]  
**Sent:** Tuesday, June 21, 2016 1:39 PM  
**To:** Wayne Miller <Miller.Wayne@azdeq.gov>  
**Subject:** 2016-6-21 - wafb - Draft Joint Agency Response to June 7 AF letter - june 15 version AH TLP - ST012 SEE EBR - cda epa

We had a discussion with Angeles and attorneys this morning. The problem when attorneys get involved they get pretty specific about what constitutes an emergency. Unclear if plume spreading constitutes and "imminent and substantial

endangerment" unless drinking water immediately effected, or immediate public health threat, e.g.: Gold King Mine, Fukushima, etc. But definitely will be elevating these concerns. Angeles will be participating on the BCT call tomorrow. Need to get her briefed to a level that she can elevate. Process for stop work under FFA is just a phone call.

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**From:** Wayne Miller [<mailto:Miller.Wayne@azdeq.gov>]

**Sent:** Tuesday, June 21, 2016 1:31 PM

**To:** d'Almeida, Carolyn K. <[dAlmeida.Carolyn@epa.gov](mailto:dAlmeida.Carolyn@epa.gov)>

**Subject:** 2016-6-21 - wafb - Draft Joint Agency Response to June 7 AF letter - june 15 version AH TLP - ST012 SEE EBR -

The letter facts appear straight forward and the points appear reasonable.

Tina is back and I will forward unless you have a recent version.

I believe the Agency is supportive, but please note that unless future AZ development can be proven impacted, ADEQ management may be hesitant to fully commit stop work. Management leadership team has split opinion on a few of points: (1) AMEC is characterizing (to a degree) by placing multiple wells around known NAPL points -- so technically they are complying (just maybe to a degree and extent that some ADEQ folk may want). (2) AMEC has stated the approach is a phase approach, so wait until AMEC defers before demanding action. (3) Will future GW production use be impacted (While aquifer restoration can be a goal, does aquifer restoration have to be the only end-all goal...given that significant distance east of liquid fuel tank farm likely industrial or not buildable).

NA2SO4 TEA arsenic issue still being researched.

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**From:** d'Almeida, Carolyn K. [<mailto:dAlmeida.Carolyn@epa.gov>]

**Sent:** Wednesday, June 15, 2016 12:10 PM

**To:** Henning, Loren <[Henning.Loren@epa.gov](mailto:Henning.Loren@epa.gov)>; Butler, Thomas <[Butler.Thomas@epa.gov](mailto:Butler.Thomas@epa.gov)>

**Cc:** Wayne Miller <[Miller.Wayne@azdeq.gov](mailto:Miller.Wayne@azdeq.gov)>

**Subject:** 2016-6-15 - wafb - Draft - Joint Agency Response to June 7 AF letter - AH TLP - ST012 SEE EBR - CDA EPA

Wayne /all

Use this version of the response letter let me know what you think; I made a few changes to the earlier version that I sent.

I am looking through the 2012 ROD now. The selected remedy to remove LNAPL at the site was alternative 3: SEE + EBR. The ROD did not distinguish between a SEE treatment zone and an EBR treatment zone for LNAPL, they were intended to be sequential treatments. There was an Alternative 4 that was evaluated that was for EBR + ozonation which Amec is now defaulting to (without ozonation as they are selecting the slower anaerobic process) for the areas outside of the SEE treatment zone. Need to read that section for reasons why alternative 4 was not selected. But nevertheless they are trying to push a fundamental change to the remedy.

Carolyn

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**From:** Henning, Loren

**Sent:** Wednesday, June 15, 2016 10:57 AM

**To:** Butler, Thomas <[Butler.Thomas@epa.gov](mailto:Butler.Thomas@epa.gov)>  
**Cc:** d'Almeida, Carolyn K. <[dAlmeida.Carolyn@epa.gov](mailto:dAlmeida.Carolyn@epa.gov)>  
**Subject:** Re: Draft Response Letter to AF from AH and TLP re ST012 SEE EBR

I'm having an update with Angeles tomorrow so will have some direction to share then.

Loren

Sent from my iPhone

On Jun 15, 2016, at 10:54 AM, Butler, Thomas <[Butler.Thomas@epa.gov](mailto:Butler.Thomas@epa.gov)> wrote:

<image001.gif>

I'm fine with this concept. I would word-smith it a touch before going final, but we need to loop in ADEQ first anyway so it may make sense for me to wait to see their approach. Regardless, we kind of need this to move quickly, so once you've heard from Loren, if you can convey it to Wayne with a sense of urgency, that'd be helpful.

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**From:** d'Almeida, Carolyn K.  
**Sent:** Wednesday, June 15, 2016 9:22 AM  
**To:** Butler, Thomas <[Butler.Thomas@epa.gov](mailto:Butler.Thomas@epa.gov)>; Henning, Loren <[Henning.Loren@epa.gov](mailto:Henning.Loren@epa.gov)>  
**Subject:** RE: Draft Response Letter to AF from AH and TLP re ST012 SEE EBR

I embellished the letter a bit with technical details - see how this reads

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**From:** Butler, Thomas  
**Sent:** Tuesday, June 14, 2016 5:21 PM  
**To:** d'Almeida, Carolyn K. <[dAlmeida.Carolyn@epa.gov](mailto:dAlmeida.Carolyn@epa.gov)>; Henning, Loren <[Henning.Loren@epa.gov](mailto:Henning.Loren@epa.gov)>  
**Subject:** Draft Response Letter to AF from AH and TLP re ST012 SEE EBR

All,

I don't know exactly where we are with this anymore, but I've drafted a short and sweet response essentially asking for Phil to engage with Angeles/Tina on this set of ST012 issues. I reference the FFA, including Section 11 (which contains the Work Stoppage section), without invoking it.

Let me know how you want to move forward.

Thanks,

Thomas

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